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Attorneys for the United States

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

V.

MATTHEW WADE BEASLEY,

Defendant.

| Case No.: 2:23-CR-00066-JAD-DJA

STIPULATION TO EXTEND DISCOVERY SCHEDULING DEADLINES

It is hereby stipulated and agreed, by and between Jason M. Frierson, United States Attorney, and Daniel R. Schiess and Eric C. Schmale, Assistant United States Attorneys, and Jacqueline Tirinnanzi, Esq., attorney for Defendant Matthew Wade Beasley, that the Court extend the deadlines for meeting and conferring regarding discovery, and the deadline for the parties proposed complex-case schedule.

This Stipulation is entered into based on the following circumstances and reasons:

1. On March 31, 2023, the Court held the initial appearance and arraignment for defendant Matthew Wade Beasley, and the Court designated the case as complex for discovery purposes. Local Rule 16-1(a)(2) provides that for complex cases, within seven days of arraignment, the parties must meet and confer regarding discovery. The local rule further provides that within seven days of this conference, the parties must file a proposed complex-case schedule.
2. On April 7, 2023, prior to the defendant's detention hearing, the parties began discussing discovery for purposes of a complex-case scheduling order, but were unable to complete the discussion.
3. The parties require additional time to complete that discussion and to propose a complex-case schedule order. The parties are unable to meet again until the week of April 17, 2023. The parties also need time to negotiate a protective order.
4. Accordingly, the parties jointly request that the deadlines for a discovery conference and filing of a proposed complex-case scheduling order be continued 14 days from the present deadlines under the Local Rules, so that the parties shall have until April 21, 2023, to confer regarding discovery, and the parties shall have until April 28, 2022, to file a proposed complex-case schedule.

DATED this 12th day of April, 2023.

JASON M. FRIERSON
United States Attorney

/s/ Eric C. Schmale
DANIEL R. SCHIESS
ERIC C. SCHMALE
Assistant United States Attorney

/s/ Jacqueline Tirinnanzi
JACQUELINE TIRINNANZI, Esq.
Attorney for Defendant Matthew Beasley

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

Case No.: 2:23-CR-00066-JAD-DJA

VS.

MATTHEW WADE BEASLEY,

Defendant.

ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, the
ORDERS that counsel for the parties shall hold a discovery conference no later than
April 21, 2023, and file a proposed complex-case schedule no later than
April 28, 2023.

Dated this 19th day of April 2023,

By: DANIEL J. ALBRECHTS
UNITED STATES MAGISTRATE JUDGE